

# LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD, SUITE 1500  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
GEORGE L. LYON, JR.  
PAMELA L. GIST  
DAVID A. LAFURIA  
S. LYNN F. RATNAVALE\*  
TODD SLAMOWITZ\*  
STEVEN M. CHERNOFF\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
—  
OF COUNSEL  
JOHN J. MCAVOY\*  
J. K. HAOE III\*  
LEONARD S. KOLSKY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS-BROWN\*

\*NOT ADMITTED IN VA

Writer's Direct Dial  
(703) 584-8661  
[dnacc@fcclaw.com](mailto:dnacc@fcclaw.com)

April 19, 2007

## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-B204  
Washington, DC 20554

**Re: Notice of Oral *Ex Parte* Communication:  
WT Docket No. 06-150 – Service Rules for the 698-746, 747-762 and 777-792  
MHz Bands**

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. Section 1.1206, we hereby provide you with notice of an oral *ex parte* presentation in connection with the above-captioned proceeding. The presentation occurred on April 18, 2007 in a meeting with Wireless Telecommunications Bureau Chief Fred Campbell.

Attending the meeting were Victor H. Meena, CEO of Cellular South as well as Kevin M. Joseph of the Joseph Group, LLC and the undersigned, as representatives of Cellular South. The oral presentation stressed the importance to smaller carriers, such as Cellular South that serves rural areas, of having the opportunity to bid on 700 MHz licenses with service areas that are smaller than Regional Economic Area Groupings ("REAGs"). Cellular South asked that the Commission make the following changes in the proposed 700 MHz band plan:

1. In the lower band, offer one paired frequency block of 12 MHz on a Cellular Market Area ("CMA") basis, and one paired frequency block of 12 MHz on an Economic Area ("EA") basis.
2. In the upper band, subdivide the 20 MHz frequency block into two 10 MHz paired frequency blocks.


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3           After subdividing the upper band frequency block, make one of the two subdivided frequency blocks available with a geographic area smaller than REAG.<sup>1</sup>

In addition, Cellular South asked that the Commission adopt geographic area build-out requirements for the 700 MHz licenses to be auctioned. A series of build-out benchmarks based upon geographic coverage of the licensed area is the best way to assure that rural areas will receive the benefits of wireless broadband services.,

Sincerely,



David L. Nace

cc:   Fred Campbell (by email)  
      Best Copy and Printing, Inc. (by email)

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<sup>1</sup> Cellular South is a member of the Rural Cellular Association which supported the Balanced Consensus Plan that requested two paired CMA frequency blocks, one of which would be in the upper band